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Attorney for Plaintiff  
JOHN (JACK) ANGELLO

FILED  
Clerk  
District Court

SEP 26 2006

For The Northern Mariana Islands  
By \_\_\_\_\_  
(Deputy Clerk)

IN THE UNITED STATES DISTRICT COURT  
OF THE  
NORTHERN MARIANA ISLANDS

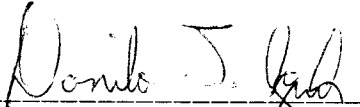
JOHN (JACK) ANGELLO,  
Plaintiff,  
v.  
NORTHERN MARIANAS COLLEGE,  
Defendant.

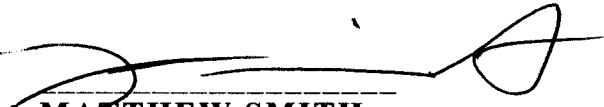
CIVIL ACTION NO. 03-0014

**SUBMISSION OF JOINT  
EXHIBIT LIST**

COMES NOW, Plaintiff herein, John (Jack) Angello, by and through his undersigned counsel Danilo T. Aguilar, Esq. and Defendant Northern Marianas College by and through its counsel Matthew Smith, Esq. hereby submit this joint exhibit list of unobjected exhibits and exhibits subject for ruling upon submission.

Dated this 26<sup>th</sup> day of September, 2006

  
DANILO T. AGUILAR  
Attorney for Plaintiff

  
MATTHEW SMITH  
Attorney for Defendant

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**JOHN (JACK) ANGELLO**

**v.**

**NORTHERN MARIANAS COLLEGE**

**IN THE U.S. DISTRICT COURT FOR THE NMI  
CV 03-0014**

**LIST OF PLAINTIFF'S UNOBJECTED EXHIBITS**

4. Copy of an NMC memo (J.A. to HRO) dated October 19, 1998: "EEO Complaint."
7. Copy of NMC Board Policy adopted August 31, 1993 and amended November 17, 1994: "Sexual Harassment."
8. Copy of NMC memo (HRO Director Kohne Ramon To Vice President Moir) dated March 11, 1999: "EEO Complaint and Grievance."
10. Copy of NMC memo (J.A. & Lino Santos) dated March 16, 1999: "VPI and Vocational Trades Department."
11. Copy of NMC memo (J.A. thru Dean Ed Camacho) dated March 26, 1999: "Grievances Against VPI (Barbara Moir)."
15. Copy of NMC memo (J.A. to HRO) dated December 13, 1999: "Resolution of Personnel Matters."
16. Copy of Dr. John Angello's letter to EOC dated December 7, 1999: "EEOC Charge No. 378980336."
41. Copy of NMC memo (J.A. to President Sablan) dated March 9, 2001: "NMC/PRA Report and BOR HR 4360 Grievance."
42. Copy of NMC Board of Regents' Policy No. 4360.
58. Copy of NMC memo (J.A. to President Sablan) dated June 20, 2001: "NMC/PRA Report and BOR HR 4360 Grievance."
59. Copy of NMC e-mail (Kohne Ramon to J.A.) dated July 2, 2000: "Your June 20, 2001 Memorandum to the President."
60. Copy of NMC memo (J.A. to HRO) dated July 9, 2001: "Your June 2, 2001 email."
64. Copy of NMC email (HRO to campus) dated April 11, 2002: "Revised Vacancy Announcement No. 02-021 (President)"

65. Copy of J. Angello's application for NMC President's position (VA No. 02-021) dated May 10, 2002.
66. Copy of NMC memo (BOR Special Assistant to J.A.) dated May 15, 2002.
67. Copy of NMC letter (Kohne Ramon To BOR Chairperson for President Search Committee K. King-Hinds) dated May 29, 2002.
68. Copy of NMC Letter (Kohne Ramon to J.A.) dated May 30, 2002 referencing qualification's denial for vacant Dean's position (VA No. 02-023).
69. Copy of NMC memo (Lino Santos to HRO) memo dated June 3, 2002: "Statement for Dr. Jack Angello."
70. Copy of NMC memo (J.A. to HRO) dated June 3, 2002: March 9, 2001 Grievance."
73. Copy of NMC e-mails (between J. Angello, Kohne Ramon and HRO) dated June 17, 2002.
74. Copy of Atty. Danilo Aguilar's facsimile letter to NMC Board of Regents dated June 18, 2002.
76. Copy of NMC letter (Kohne Ramon to J.A.) dated July 22, 2002 referencing qualification's denial for vacant President's position (VA No. 02-023).
77. Copy of NMC Qualification Evaluation Worksheet (for J.A.) dated May 23, 2002.
78. Copy of Senate Joint Resolution No. 13-6 dated September 3, 2002.
81. Copy of NMC e-mail (BOR Special Assistant to J.A.) dated February 28, 2003 referring to the official minutes of the September 23, 2002 Board of Regents' Meeting.
82. Copy of BOR minutes of Executive Session of September 23, 2002.
83. Copy of NMC President Wright's Sept. 19, 2002 memo passed around during the Sept. 23, 2002 BOR Executive Session.
84. Copy of NMC's New Organizational Design passed around during the September 23, 2002 BOR Executive Session.
85. Copy of NMC termination memo (President Wright to J.A.) dated September 24, 2002.
86. Copy of NMC Personnel Action terminating J. Angello dated October 3, 2002.
90. Copy of 1 CMC §7402, 7403, 7404, and 7405: "Reprogramming Authority."

91. Copy of Petition and Declaration dated October 3, 2002.
98. Copy of NMC President Wright's letter to BOR Chairman Seman dated November 25, 2002.
99. Copy of NMC's Qualification Evaluation Worksheet (J. Angello) dated November 27, 2002.
100. Copy of employee Appeals Committee's Decision (re: 01-001, J. Angello) dated December, 2002.
101. Copy of NMC President Wright's letter to Representative Stanley Torres dated January 14, 2003.
102. Copy of Atty. Jesus Borja's facsimile letter to NMC President, dated January 15, 2003: "Additional Comments to Laboratory School and Vocational, Occupational and Technical Training Center and Professional Institute.
103. Copy of President Wright's letter to CNMI Joint Legislature dated February 6, 2003.
105. Copy of NMC Appeals Committee's Decision (re: 02-004, J. Angello) dated February 14, 2003.
110. Copy of NMC memo (HRO) to BOR) dated July 14, 2002: "President's Eligibility List."
111. Copy of NMC's Vacancy Announcement No. 04-029 for President's position dated June 11, 2004.
112. Copy of NMC's Qualification Evaluation Worksheet (J. Angello) dated July 15, 2004: "J. Angello now 'meets' qualifications requirement."
113. Copy of Plaintiff's First Request For Admissions dated February 20, 2005.
114. Copy of Defendant NMC's Answers And Objection To Plaintiff's First Request for Admissions dated April 22, 2005.
121. Copy of NMC's Request For Recruitment documents (Dean, Continuing Education) from April 30, 2002 to May 28, 2002.
122. Copy of NMC's Request For Recruitment documents (Bookstore Manager) from August 19, 2002 to May 23, 2003.
123. Copy of NMC's Recruitment of Vacancy No. 03-015.
124. Copy of NMC's Recruitment of Vacancy No. 03-015.
125. Transcript of Deposition of Lino B. Santos.

**JOHN (JACK) ANGELLO**

**v.**

**NORTHERN MARIANAS COLLEGE**

**IN THE U.S. DISTRICT COURT FOR THE NMI  
CV 03-0014**

**LIST OF DEFENDANT'S UNOBJECTED EXHIBITS**

- A. Angello NMC Employment Contract No. 1222
- B. NMC Organization Redesign Charts and Plan
- C. Board of Regents Agenda (September 23, 2002)
- D. Board Policy1009: Position Description for the President of the College
- E. 9-24-02 Memo from Wright to Angello re: Termination w/ HRO Personnel Action
- F. 9-24-02 Memos from Wright to ten other NMC Employees re: Termination
- G. 9-27-02 Memo from Wright to Faculty & Staff re: Position Re-assignments
- H. 10-1-02 Memo from Wright to HRO re: Organizational Changes
- I. 10-28-98 EEO Complaint from Angello
- J. 3-16-99 Memo from Angello & Santos re: VPI and Vocational Trades Dept.
- K. 3-26-99 Memo from Angello to HRO re: Grievances Against VPI
- L. 12-7-99 Letter from Angello to EEOC re: Withdrawal of Charge
- M. 3-9-01 Memo from Angello to President re: PRA & Grievance with PRA Report
- N. 3-9-01 Memo from Angello to President: Reconsideration of Decision
- O. 8-26-02 Letter from Edward Camacho re: Angello and PRA
- P. 11-25-02 Letter from Wright to Board Chair re: Angello Grievance
- Q. 12-16-02 Decision of Employee Appeals Committee re: 01-001 Angello Grievance

R. 2-14-03 Decision of Employee Appeals Committee re: 02-004 Angello Grievance

S. EEOC Charge No. 378-A3-00145 and Notice of Right To Sue

T. EEOC Charge No. 378-2004-00351 and Notice of Right To Sue

U. Angello Application for Employment (9-29-97) VP For Instruction

V. 3-5-01 Letter from Sablan to Angello re: Application Requirements

W. 3-8-99 Memo from Angello to Dept of Ed re: discontinuance of classes

X. 5-14-02 Angello Qualification Evaluation Worksheet

Y. 11-27-02 HRO Memo to File

Z. 11-27-02 Angello Qualification Evaluation Worksheet

AA2-18-03 Angello e-mail to HRO re: Application for President

BB 2-21-03 Wright's Response to Angello's email to HRO

CC 6-3-02 Memo from Santos to HRO re: Angello and Voc. Ed.

DD 9-19-02 Memo from Wright to BOR re: Organizational Redesign

EE 12-19-02 Letter from HRO To Angello re: NMC Vacancies

FF 3-4-06 Deposition of Barbara Moir

GG 9-30-04 & 10-5-04 Deposition of John (Jack) Angello

**JOHN (JACK) ANGELLO**

**v.**

**NORTHERN MARIANAS COLLEGE**

**IN THE U.S. DISTRICT COURT FOR THE NMI  
CV 03-0014**

**LIST OF PLAINTIFF'S EXHIBITS OBJECTED TO BY DEFENDANT  
AND TO BE RULED UPON FOR ADMISSION**

2. Copy of NMC memo (Dean Klingsberg to President McPhetres) dated February 4, 1997: "Recommendation for Jack Angello For Step Increase"
5. Copy of Governor's Directive dated July 17, 1998: "Policy of the CNMI Regarding Equal Employment Opportunity."
6. Copy of NMC Board of Regent's Policy adopted July 27, 1994: "Equal Opportunity and Affirmative Action."
9. Copy of NMC memo (J.A. to President McPhetres) dated March 9, 1999: "Notification of Grievances."
13. Copy of NMC (J.A. to K. Ramon) e-mail, dated April 14, 1999: "Medical Leave Status."
14. Copy of NMC (K. Ramon to President Mc Phetres) memo, dated November 12, 1999: "Recommendation for Settlement – Grievance for Dr. Jack Angello."
17. Copy of NMC Board of Regents Chairman letter to PRA's Butch Wolf, dated October 8, 1999.
18. Copy of NMC and Pacific Rim Academy's lease, dated October 8, 1999.
19. Copy of NMC's Film and Video Production Program concept, dated 1999.
20. Copy of NMC's (Dr. Angello & PRA to Governor) letter, dated April 27, 2000.
21. Copy of NMC's (Dr. Angello to Scholarship Office) letter, dated May 3, 2000.
22. Copy of NMC (J.A. to Dean Camacho) memo dated June 8, 2000: "Pacific Rim Academy."

23. Copy of NMC's (Dr. Angello to scholarship Office) letter, dated June 26, 2000.
24. Copy of NMC (J.A. to Dean Camacho) memo, dated July 18, 2000: "CEU Course & Instructor Approval."
25. Copy of NMC (J.A. to President Sablan, V.P. Moir, and Dean Camacho) e-mail, dated July 18, 2000: "NMC and Pacific Rim Luncheon Meeting on Wednesday (7/19/2000)."
26. Copy of NMC memo (J.A. to Dean Moir) dated August 4, 2000: "Vocational & A/V Course Schedules & Guides."
27. Copy of NMC e-mail (Dean Moir to Admin Records, Dean Camacho, J.A., Biz Office) dated August 4, 2000; "Changes To Fall 2000 Class Schedule."
28. Copy of Mr. Leonard (Butch) Wolf's letter to NMC President dated August 4, 2000.
29. Copy of official NMC's web page (Vocational Educational Department) dated October 10, 2000.
30. Copy of NMC fax (J.A. to Butch Wolf) dated October 24, 2000.
31. Copy of NMC letter (Dean Camacho to Mr. Leonard (Butch) Wolf) dated October 24, 2000.
32. Copy of NMC memo (J.A. to Dean Camacho) dated October 24, 2000: "Spring 2001 Class Schedule (Tech Trades)."
33. Copy of NMC memo (J.A. to Bruce Johnson, B. Moir) dated October 24, 2000: "Spring 2001 Class Schedule."
34. Copy of NMC e-mail (J.A. to Fred Hill) dated November 26, 2000: "New Courses."
35. Copy of NMC e-mails (J.A. to Larry Lee, B. Moir) dated December 3 & 4, 2000: "Spring Schedule."
36. Copy of excerpt from Official NMC Spring 2001 Class Schedule.
37. Copy of NMC memo (Tinian Administrator to NMC President Sablan) dated January 19, 2001.
38. Copy of NMC memo (J.A. to Dean of Continuing Education) dated January 22, 2001: "Removal of PRA Property."
39. Copy of Mr. Butch Wolf's letter to NMC Board of Regents and NMC President Sablan dated January 22, 2001.

- 40. Copy of NMC letter (Dr. Angello to Scholarship Office) dated March 9, 2001
- 43. Copy of NMC e-mails (J.A. to & from Tinian, President Sablan) dated March 5, 6 & 11, 2001: "Tinian Visit."
- 44. Copy of CHC illness certification slip dated April 2, 2001.
- 45. Copy of CHC prescriptions dated April 4, 2001.
- 46. Copy of J. Angello's prescriptions dated March 1 & 7, 2001.
- 47. Copy of J. Angello's prescriptions dated April 7 & 12, 2001.
- 48. Copy of J. Angello's prescriptions dated June 21 & September 15, 2001.
- 49. Copy of J. Angello's prescriptions dated March 27, 2001.
- 50. Copy of employee time sheet (John Angello) dated April 1, 2001.
- 51. Copy of application for leave (John Angello) dated April 3 & 4, 2001.
- 52. Copy of application for leave (John Angello) dated April 5 & 6, 2001.
- 53. Copy of employee time sheet (John Angello) dated April 20, 2001.
- 54. Copy of application for leave (John Angello) dated April 20, 2001.
- 55. Copy of application for leave (John Angello) dated April 20, 2001.
- 56. Copy of NMC memo (J.A. to HRO) dated April 10, 2001: "For My File (J. Angello): On-The-Job Injury.
- 57. Copy of Dr. Angello's letter to Attorney Joseph Arriola dated April 25, 2001.
- 61. Copy of Atty. Joseph Arriola's letter to NMC President Sablan dated July 9, 2001: "Lease Agreement With PRA/Failure to Institute PRA Instructional Program."
- 62. Copy of NMC President Sablan's letter to Leonard (Butch) Wolf dated October 11, 2001.
- 63. Copy of NMC letter (J.A. to Rep. Stanley Torres) dated March 18, 2002: "NMC Vocational & Technical Institute."
- 71. Copy of NMC e-mail (President's assistant to campus) dated June 4, 2002: "Interim President B. Moir to NMC campus: "Appointment of new Dean of Continuing Education."

- 72. Copy of Dr. Angello's letter to Atty. Danilo Aguilar dated June 24, 2002.
- 75. Copy of NMC memo (J. Angello to HRO file) dated June 24, 2002: "HRO's Evaluation Process."
- 79. Copy of NMC memo (J. Angello to President Wright) dated September 3, 2002: "Vocational Education."
- 80. Copy of Dr. Angello's letter to CNMI Governor and Lt. Governor dated September 16, 2002.
- 87. Copy of Governor's letter to CNMI Legislature with attached Public Law 13-24: "CNMI Budget Act For FY 2003 signed on September 10, 2002.
- 88. Copy of FY 2002, 2003 & 2004 CNMI Government's Operating Expenditures Worksheet: Northern Marianas College Operations Budget (1605).
- 89. Copy of FY 2002, 2003 & 2004 CNMI Government's Operating Expenditures Worksheet: Northern Marianas College Apprentice-P.L. 10-66/P.L. 5-32 Budget (3450).
- 92. Copy of NMC Annual Evaluation (J. Angello) dated June 3, 1997.
- 93. Copy of NMC Annual Evaluation (J. Angello) dated June 3, 1998.
- 94. Copy of NMC Annual Evaluation (J. Angello) dated May 23, 2000.
- 95. Copy of NMC Administrator's Evaluation (J. Angello) dated October 9, 2002.
- 96. Copy of Mr. Butch Wolf's letter to the Office of the Public Auditor dated October 31, 2002.
- 97. Copy of Lt. Governor's letter to Dr. Angello dated November 8, 2002.
- 104. Copy of CNMI House Bill 13-229 pre-filed on December 4, 2002.
- 106. Copy of the Office of the Public Auditor's Executive Summary AR-03-03 Dated February 19, 2003.
- 107. Copy of CV 03-0014 Declaration of Leonard (Butch) Wolf dated July 11, 2003.
- 108. Copy of NMC letter to Lenice Kapileo dated August 11, 2003.
- 109. Copy of NMC Employee Appeals Committee's Decision (re 03-003, Lenice Kapileo) dated August 8, 2003.

115. Copy of Public Auditor's letter to Interagency Audit Coordinating Advisory Group dated December 2, 2005.
116. Copy of the Office of The Public Auditor's Audit Recommendations Tracking Report (Report No. TR-05-01 dated December 2, 2005).
117. Copy of Saipan Tribune story dated December 5, 2005: "7 agencies fail to Act on 24 recommendations."
118. Copy of NMC's Operating Expenditure Worksheet Unit No. 3450, submitted to the Governor's Office for FY 2003 Budget Request.
119. Copy of NMC's Personnel Service Worksheet Unit No. 3450, submitted to the Governor's Office for FY 2003 Budget Request.
120. Copy of NMC's Financial Statements and Independent Auditor's Report (Deloitte Touche Tohmatsu) for Years Ended in September 30, 2003 and 2002.

**JOHN (JACK) ANGELLO**

**v.**

**NORTHERN MARIANAS COLLEGE**

**IN THE U.S. DISTRICT COURT FOR THE NMI  
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**LIST OF PLAINTIFF'S EXHIBITS TO BE STRICKEN OUT**

1. Copy of an NMC memo (Dean Klingsberg to President McPhetres) dated February 4, 1997: "Recommendation for Jack Angello for Step Increase."
3. Copy of NMC memo (Director Algaier to file) dated October 19, 1998: "Director of School of Education's letter commending Dr. Jack Angello."
12. Copy of CNMI Department of Public Health letter (Dr. Battone) dated April 6, 1999.